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7 **UNITED STATES DISTRICT COURT**
8 **WESTERN DISTRICT OF WASHINGTON**
9 **AT SEATTLE**

10 ERIC GILBERT,

11 Plaintiff,

12 v.

13 NORDSTROM, INC.; NAVY ACQUISITION
14 CO., INC.; NORSE HOLDINGS, INC.; ERIK
15 B. NORDSTROM; PETER E. NORDSTROM;
16 JAMES L. DONALD; KIRSTEN A. GREEN;
17 GLENDA G. MCNEAL; AMIE THUENER
18 O'TOOLE; GUY B. PERSAUD; ERIC D.
19 SPRUNK; BRADLEY D. TILDEN; MARK J.
20 TRITTON; ATTICUS N. TYSEN; EL
21 PUERTO DE LIVERPOOL S.A.B. DE C.V.,

22 Defendants.

Case No. 25-cv-00568

**[PROPOSED] ORDER GRANTING EX
PARTE MOTION TO EXPEDITE
BRIEFING AND NOTATION DATE
FOR EXPEDITED DISCOVERY
AHEAD OF SETTING OF MERGER
VOTE**

THIS MATTER came before the Court on the *ex parte* motion for Plaintiff Eric Gilbert (“Plaintiff”) for leave to expedite discovery, including briefing, on Defendants Nordstrom, Inc., Erik. B. Nordstrom, Peter B. Nordstrom, and El Puerto de Liverpool S.A.B. de C.V. (the “Motion”). The Court has considered the Motion, the requests for discovery in Exhibits A-B, as limited by the Motion (the “Discovery Requests”),¹ the supporting declarations, and the governing law.

The Court finds that Plaintiff has demonstrated good cause to expedite discovery prior to a Rule 26(f) conference. Accordingly, it is hereby ORDERED that Plaintiff’s Motion is GRANTED as follows:

- Defendants Nordstrom, Inc., Erik. B. Nordstrom, Peter B. Nordstrom, and El Puerto de Liverpool S.A.B. de C.V (“Defendants”) shall file any opposition(s) to the Motion and Discovery Requests by Tuesday, April 8, 2025;
- Defendants shall: (a) serve responses to Interrogatories Nos. 2-3 limited to the “September 3 Proposal” and the “Anti-Takeover Statute” topics, and (b) produce documents responsive to Requests for Production Nos. 1-4 limited to the “September 3 Proposal” and the “Anti-Takeover Statute” topics by no later than 10 calendar days from the date of this Order;
- Promptly upon Defendants’ production of documents in accordance with the foregoing paragraph, the parties shall submit a briefing schedule that contemplates a hearing on Plaintiff’s forthcoming motion for preliminary injunction in advance of the stockholder

¹ For the avoidance of doubt, the Discovery Requests include Interrogatories Nos. 2-3 and the Requests for Production Nos. 1-4, as limited by the search terms and relevant time period as described in the Motion.

1 vote on the Merger.² Defendants shall notify Plaintiff of the date of the stockholder
2 vote as soon as practicable.
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4 Dated this ____ day of April 2025.
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7 Honorable James L. Robart
8 United States District Judge
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27 _____
28 ² As defined in Plaintiff's Complaint filed on March 31, 2025.